

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

IN RE:)	
)	
DAVID DARNELL BROWN,)	Bankruptcy No. 3:10-bk-11399
)	
Debtor.)	Chapter 13
)	Judge Paine
DAVID DARNELL BROWN,)	
)	
Plaintiff,)	Contested Matter
)	Debtor's Complaint to Compel
)	Turnover
v.)	Ad. Proc. No. 3:10-ap-00604
)	
INTERNAL REVENUE SERVICE,)	
)	
Defendant.)	

AGREED ORDER OF SETTLEMENT

It appearing to the Court that the Parties have agreed in the above styled cause it is hereby ORDERED, ADJUDGED, and DECREED that upon the payment of fifteen thousand dollars (\$15,000.00) in certified funds made by the Debtor to the Department of Treasury that Debtor's collateral listed in Exhibit 1 as attached shall be returned to the Debtor.

Further, the Debtor shall begin making adequate protection payments monthly to the Internal Revenue Service in the amount of five thousand dollars (\$5,000.00) per month, beginning 45 days from entry of this Order. After two (2) payments have been made, the items listed in Exhibit 2 shall be voluntarily returned to the Debtor. After four (4) payments have been made, the items listed in Exhibit 3 shall be returned to the Debtor; when six (6) payments have been made, the items listed in Exhibit 4 shall be returned to the Debtor; and when eight (8) payments have been made, the items listed in Exhibit 5 shall be returned to the Debtor by the Internal Revenue Service. The Internal Revenue Service will make the specified items available for the Debtor to pick up, at Debtor's expense, at mutually convenient times, and as soon as practicable after the required funds are paid by the Debtor.

The one \$15,000.00 payment and the eight \$5,000.00 payments referenced in this order shall be made by delivery of certified funds to counsel for the Internal Revenue Service, Caroline R. Krivacka, 810 Broadway, Suite 400, Nashville, TN 37203.

The Internal Revenue Service shall remain as a secured creditor in the Debtor's bankruptcy plan until such time as a plan of reorganization is confirmed by this Court.

If the debtor fails to make any of the payments pursuant to the terms of this Agreed Order, the Internal Revenue Service will file an Order of Non-Compliance with the Court and the stay will be lifted within ten days of entry of the Order of Non-compliance to allow the Internal Revenue Service to sell the items remaining in the custody of the Internal Revenue Service. Debtor will not oppose the lifting of any stay in effect at the time of the defaulted payment or pursue turnover of any items remaining in the custody of the Internal Revenue Service. At that time, the Internal Revenue Service will pursue sale of the remaining items.

*THIS ORDER WAS SIGNED AND ENTERED ELECTRONICALLY AS INDICATED ON THE
TOP OF THE FIRST PAGE*

Respectfully submitted,

/s/ Lynda F. Jones

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Date: November 23, 2010

	<u>EXHIBIT 1</u>
1	Digidesign digital mixing board with 24 channels
2	Akai Professional MPC 2000XL drum machine, midi production center,
3	Roland MV-8000 product studio (drum machine)
4	Allen & Heath GL2400 mixing board
5	Stanton turntable
6	Stanton dj cd turntable
7	Alesis masterlink ML-9600 High-Resolution Master Disk Recorder
8	Universal Audio amplifier
9	Sony power supply unit
10	Midi 2 piece Digidesign loopmaster
11	Monster Power Pro 2500 professional power center
12	T C Electroic Reverb 4000
13	Behringer Powerplay Pro XL 4 channel headphone distribution amplified with headphones
14	Tascam Professional cd rewritable recorder, 2004
15	Yamaha motif ES6 keyboard
16	Roland Fantom X8 Keyboard
17	Cabinet with Furman Linear filter Pro 2500, Monster Powerpro 2500 professional power center, Roland fatom XR, 128 voice
18	synthesizer sampler, KORG Triton-Rack expandable high module sampler
19	JRX 100 Powered Subwofer, 500 watt built in amplifier
20	2 2008 Mackie Active Sound Reenforcement speaker system
21	Octave Copy Master 2 cd duplicator
22	Apple Powermack G5, 1969C with keyboard and mouse
23	Rocstore firewire harddrive
24	RocStor firewire harddrive
25	2 JBL Professional bi-amplified monitors
26	Sony condenser microphone
27	Black leather swivel glider chair

EXHIBIT 2

1	LG Flatron Plasma 51 inch tv with remote, speakers
2	Canon LV-53 projector
3	Sharp Vision projector
4	Morantx DVD player
5	Marantz AV surround receiver
6	Toshiba VHS DVD due player with remote
7	Black leather home studio seating (3 piece set)
8	MX 3000 dynamic entertainment system remote, universal
9	Garmin Nuvi GPS w/car adaptor and mount
10	Artograph tracer projector
11	Samsung 40 inch LCD tv on short stand
12	7 piece Onkyo amplifier 2 polk audio wall speakers, 2 polk audio speakers on stand, 1 standing polk audio speaker, 1 polk audio
13	Samsung 55 inch projection tv on stand
14	7 piece Samsung surround sound system 4 tower speakers, sub woofer, center channel and CD stand
15	Sharp Aquos 32 inch LCD tv
16	Sharp Aquos 20 inch LCD tv
17	center channel speaker, 2 remotes
18	Apco Projecta scope
19	African Musical Instrument
20	"V" Vibe Award from 2004 "Best Group-G-Unit)
21	50 Cent Double Platinum Sales Get Rich or Die Tryin, picture Canada 2004
22	50 Cent 6 time Certified Platinum, Get Rich or Die Tryin picture, Canada 2004
23	50 Cent 4 time Certified Canadian Platinum picture Canada 2004

EXHIBIT 2

24	50 Cent Plaque with album Get Rich or Die Tryin, 100,000 copies sold
25	50 Cent Gold Record Award for Get Rich or Die Tryin
26	50 Cent-Get Rich or Die Tryin 10 million world wide sales Award from Aftermath Laterscope Records
27	50 Cent -Get Rich or Die Tryin Award Presented to Young Buck
28	Picture of 50 Cent, Lloyd Banks, and G-Unit member performance
29	50 Cent "Get Rich or Die Tryin" and "The Massacre: Award presented to Young Buck in the Asia Region June 2006
30	Sundeck Gold Award presented to Young Buck
31	50 Cent Award Presnted to Young Buck in Commeration of Platinum Sales for 50 Cent Massacre album
32	50 Cent Get Rich or Die Tryin Award presented to Young Buck in Recognition of Achieving Gold in New Orleans.
33	Double Platinum Award New Zealand 2006
34	Potrait of Lloyd Banks, Tonny Yao Yao, 50 cent, Eminem and Young Buck
35	G-Unit Beg for Mercy Award pictures
36	Award Presnted to Young Buck
37	Young Buck Painting entitled "Where Art Meets Fashion:
38	Award Presented to Young Buck
39	XXL Award May 2007
40	Drawing of Young Buck (Rap Artis) by Sher Wel
41	Drawing of the Original G-Unit Crew
42	G Unit Crew framed photo
43	Picture of Members of G-Unit 50 Cent and Lloyd Banks
44	Framed newspaper clippings from the Tennessean
45	G-Unit Clothing Modeled by Young Buck picture
46	1,000,000 milion copies Award "Straight Outta Cashville
47	Award for gold sales-Beg for Mercy

EXHIBIT 2

48	Award-Get Rich Quick or Die Tryin Australia
49	Award-First Annual Hip Hop-Did you Miss Me
50	Award-500,00 copies June 2003
51	Award to Young Buck-150,000 copies of the Album Get Rich or Die Tryin-Germany 2003
52	Award presented to Young Buck Certified sales over 1 million
53	Faux Fur Mens light grey coat w/ YB Cashville" stitched inside
54	GINO Green Global Blue Leather coat with stiched "g"s on the outside
55	Al Wissann white leather coat w/Detroit Motor City embroidery
56	White leather watch with inscription on back

<u>PROPERTY DESCRIPTION</u>	<u>LEVEL OF HOUSE</u>	<u>ROOM</u>	<u>COMMENTS</u>
LG Stainless side by side refrigerator with tv and remote	Basement	Kitchen	3
Ms. Pac Man video game	Basement	Rec Room	3
Navy Blue Full face motorcycle helmet	Basement		3
Black leather Harley Davidson Motorcycle gloves	Basement		3
Approximately 8 white leather dining chairs with metal frames	Main Floor	Dining Room	3
5 ft silver wall mirror	Main Floor	Foyer	3
Panasonic 43 inch Plasma tv	Main Floor	Kitchen	3
Glasstop table with 3 matching chairs w/white leather seats	Main Floor	Kitchen	3
Off white "L" sectional sofa	Main Floor	Living Room	3
Marble coffee table with metal frame	Main Floor	Living Room	3
Small glass sofa table	Main Floor	Living Room	3
Large glass sofa table	Main Floor	Living Room	3
Brown table lamp	Main Floor	Living Room	3
Lacoste Black Wool Coat	Main Floor	Master Bedroom	3
Live Mechanics Black vest with purple lining	Main Floor	Master Bedroom	3
Bachrach 42L black suit jacket w/36W Black pants (white pin stripe)	Main Floor	Master Bedroom	3
Eight 732 Royal Fleet Hoodie (black) with embroidery	Main Floor	Master Bedroom	3
Barney's Leather coat black w/shirt buttons and hem	Main Floor	Master Bedroom	3
Harley Davidson Black leather coat	Main Floor	Master Bedroom	3
Live Mechanics Brown coat	Main Floor	Master Bedroom	3
Multi-color blue cuff links	Main Floor	Master Bedroom	3
Men's black leather wallet	Main Floor	Master Bedroom	3
White sofa, leather with curved style and back	Main Floor	Sitting Room	3
White swivel leather chair	Main Floor	Sitting Room	3
White swivel leather chair	Main Floor	Sitting Room	3
5 ft lamp w/white leather shade	Main Floor	Sitting Room	3
5 ft lamp with white leather shade	Main Floor	Sitting Room	3
3 ft table lamp with white leather shade	Main Floor	Sitting Room	3
White/Silver 3 ft Santa decoration	Main Floor	Sitting Room	3
Wooden bed with headboard, rails, foot board	Second Floor	Guest Room	3
Wooden dresser	Second Floor	Guest Room	3
Wooden nightstand	Second Floor	Guest Room	3

<u>PROPERTY DESCRIPTION</u>	<u>LEVEL OF HOUSE</u>	<u>ROOM</u>	<u>COMMENTS</u>
Indigenous Art from Australia, wood frame			4
X-Box machine	Basement	Rec Room	4
Mini football helmets in case	Basement	Rec Room	4
Wooden foot ball table	Basement	Rec Room	4
Craps gaming table	Basement	Rec Room	4
Blvd Broken Dreams sign	Basement	Rec Room	4
Arcade Legends video game	Basement	Rec Room	4
Louis Vuitton gun holster	Basement	Studio	4
Al Pacino Scarface picture	Basement		4
The Rat Pack Pool table picture	Basement		4
Print-Titans autographed-Lendall White	Basement		4
Print-Snoop Dog and Tupac	Basement		4
Glow mirror marijuana leaf picture	Basement		4
Titans Refrigerated soda machine	Basement		4
Tattoo Kit	Basement		4
Titans Bar Stool	Basement		4
New 2000 count bucket pain balls	Garage		4
Clear bar with 2 stools and electric light 4 ft tall	Main Floor	Kitchen	4
Abstract print infused on wood frame	Main Floor	Living Room	4
Indigenous Art from Australia, wood frame	Main Floor	Living Room	4
Picture "Five Gauche" #80 acrylic screen print	Main Floor	Living Room	4
Abstract Print "Diot Nude"	Main Floor	Living Room	4
Abstract Print titled "Discovery I"	Main Floor	Living Room	4
Abstract Art-Impressionist	Main Floor	Living Room	4
Abstract-silver/white dimensional squares	Main Floor	Living Room	4
Royal Copenhagen white bears figurines (3)	Main Floor	Living Room	4
4 set black and white studio style candles	Main Floor	Living Room	4
3 piece black and black and white vases	Main Floor	Living Room	4
12" Ebony spiral jar	Main Floor	Living Room	4
Silver Statue	Main Floor	Living Room	4
Silver decorative vases	Main Floor	Living Room	4
Round clear decorative art (2 pieces)	Main Floor	Living Room	4
De Amechi Black Faux Fur Men's coat	Main Floor	Master Bedroom	4
Hand crafted snake skin purse from Nigeria	Main Floor	Master Bedroom	4
Throwbacks NFL Mitchell & Ness Browns Jacket	Main Floor	Master Bedroom	4
Stall & Dean Aviation Jacket (Navy Blue)	Main Floor	Master Bedroom	4
Artful Dodger Black Nylon Jacket with embroidery	Main Floor	Master Bedroom	4
Black mobile watch in box w/accessories	Main Floor	Master Bedroom	4
Black leather Bank watch w/skull on face-diamond chips around face	Main Floor	Master Bedroom	4
Ed Hardy, "Love kills slowly" watch w/black	Main Floor	Master	4

EXHIBIT 4

band		Bedroom	
Sweet Romance brand black and stone cross necklace with chain	Main Floor	Master Bedroom	4
Multicolored stone chain necklace	Main Floor	Master Bedroom	4
Skull Chains	Main Floor	Master Bedroom	4
Black leather bracelet with silver spikes	Main Floor	Master Bedroom	4
Black leather skull wrist band	Main Floor	Master Bedroom	4
Freeze brand stainless steel watch	Main Floor	Master Bedroom	4
925 Italy Black Cross with black stones and chain	Main Floor	Master Bedroom	4
Decorative crystal and stones	Main Floor	Sitting Room	4
Misc. lot with cell phone, gloves, empty sun glass boxes, Uncle Mike's sidekick holster, Phillips I pod accessories, Pro tech Outdoors holster			4

	<u>EXHIBIT 5</u>
1	615 Cashville Records necklace
2	Breitling Bentley watch with diamond face and band